

**THE HONORABLE MARY JO HESTON
CHAPTER 13
LOCATION: Tacoma, Washington**

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

In re:

JAMES CALVIN MORRISON II and
CINDY LEE MORRISON,

Debtors.

Case No.: 16-44542-MJH

DECLARATION OF ELIZABETH ROSS
IN SUPPORT OF MOTION TO DISMISS

I, Elizabeth Ross hereby declare that the following statements are true and correct to the best of my knowledge, and I am subject to penalty of perjury under the laws of the United States:

1. I am over the age of eighteen, a resident of the United States of America, and otherwise competent to provide the following testimony from my personal knowledge.
2. I am employed by Michael G. Malaier, Chapter 13 Trustee charged with administering the instant bankruptcy estate.
3. According to our records, Debtors have failed to make all payments as required by the plan. Debtors' plan payments are \$3,000.00 per month of which \$2,800.00 per month is

to be applied to plan payment arrears and \$100.00 per month is to be applied to ongoing plan payments.

4. As of today's date, the payment delinquency stands at \$13,287.16, pursuant to the below payment history:

Period	Date (Month/Year)	Payment Due	Payment Received	Forgive Amount	Amount Due
1	11/2016	\$143.08			\$143.08
2	12/2016	\$715.40	\$715.40		\$143.08
3	1/2017	\$572.32	\$572.32		\$143.08
4	2/2017	\$572.32	\$572.32		\$143.08
5	3/2017	\$715.40	\$572.32		\$286.16
6	4/2017	\$572.32	\$572.32		\$286.16
7	5/2017	\$641.56	\$715.40		\$212.32
8	6/2017	\$830.80	\$595.40		\$447.72
9	7/2017	\$664.64	\$166.16		\$946.20
10	8/2017	\$664.64	\$166.16		\$1,444.68
11	9/2017	\$830.80	\$830.80		\$1,444.68
12	10/2017	\$664.64	\$602.16		\$1,507.16
13	11/2017	\$664.64	\$218.00		\$1,953.80
14	12/2017	\$830.80	\$880.00		\$1,904.60
15	1/2018	\$664.64	\$440.00		\$2,129.24
16	2/2018	\$830.80	\$880.00		\$2,080.04
17	3/2018	\$664.64	\$440.00		\$2,304.68
18	4/2018	\$664.64	\$880.00		\$2,089.32
19	5/2018	\$664.64	\$440.00		\$2,313.96
20	6/2018	\$996.96	\$1,540.00		\$1,770.92
21	7/2018	\$664.64	\$660.00		\$1,775.56
22	8/2018	\$664.64	\$880.00		\$1,560.20
23	9/2018	\$664.64	\$440.00		\$1,784.84
24	10/2018	\$332.32	\$880.00		\$1,237.16
25	11/2018	\$3,000.00	\$1,450.00		\$2,787.16
26	12/2018	\$3,000.00			\$5,787.16
27	1/2019	\$3,000.00			\$8,787.16
28	2/2019	\$3,000.00			\$11,787.16
29	3/2019	\$1,500.00			\$13,287.16

5. I have mailed delinquency letters to the debtor with a copy emailed to the debtors' attorney.
6. I will provide any further information required by the Court to assist in its adjudication of the issues presented in the Motion to Dismiss.

EXECUTED at Tacoma, Washington this 13th day of March, 2019.

/s/ Elizabeth Ross

Elizabeth Ross, Case Administrator for
Michael G. Malaier, Chapter 13 Standing Trustee